

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
MIDLAND/ODESSA DIVISION**

**INTELLECTUAL VENTURES I, LLC and  
INTELLECTUAL VENTURES II LLC,**

*Plaintiffs,*

**v.**

**SOUTHWEST AIRLINES CO.,**

*Defendant.*

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**Civil Action No. 7:24-cv-00277-ADA**

**JURY TRIAL DEMANDED**

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**DEFENDANT SOUTHWEST AIRLINES CO.’S UNOPPOSED MOTION FOR  
LEAVE TO INCREASE THE NUMBER OF CLAIM TERMS AND PAGE  
LIMITS FOR OPENING AND RESPONSIVE CLAIM CONSTRUCTION BRIEFS**

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Defendant Southwest Airlines Co. (“Southwest”) moves for leave to permit claim construction of 15 terms with a total page limit of 40 pages for principal briefs and 20 pages for replies.

This case involves ~~six~~ unrelated patents, justifying an increase of the default page limitations and limit on the number of claim terms. Accordingly, pursuant to the Court’s January 23, 2024, Standing Order Governing Proceedings (“OGP”), Southwest conferred with Plaintiffs Intellectual Ventures I, LLC and Intellectual Ventures II, LLC (“IV”) on May 16, 2025 to discuss the Court’s default limitations on the number of claim terms and page counts for claim construction briefing. IV does not oppose this motion.

For the foregoing reasons, Southwest respectfully requests that the Court grant leave to expand the number of claim terms for construction to 15 and to allow the parties 40 pages for opening claim construction briefs and 20 pages for reply briefs.

Dated: May 20, 2025

Respectfully submitted,

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*Attorneys for Southwest Airlines Co.*

**CERTIFICATE OF CONFERENCE**

I, the undersigned counsel, hereby certify that I conferred with counsel for Plaintiffs on May 16, 2025, regarding the relief requested herein. The motion is unopposed.

/s/ S. Wallace Dunwoody  
S. Wallace Dunwoody

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on May 20, 2025, the foregoing document has been served on all counsel of record via the Court's CM/ECF system.

/s/ S. Wallace Dunwoody  
S. Wallace Dunwoody

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